

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
PECOS DIVISION**

UNITED STATES OF AMERICA

V.

THOMAS SCOTT PERKINS,

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NO. P-20-CR-388

DEFENDANT’S UNOPPOSED MOTION TO CONTINUE

TO THE HONORABLE DAVID COUNTS:

Thomas Perkins, moves for a continuance of his plea deadline and trial:

I. Facts.

Perkins was arrested on September 14, 2020, and appointed counsel on September 22. His plea deadline is October 30 and trial is scheduled for November 17. Perkins is charged with possessing and distributing child pornography. Discovery in this case involves a large number of devices that the government has not finished examining or yet made available to the defense.

II. Reasons for Continuance.

Both parties require additional time to review the relevant evidence.

III. Certificate of Conference.

The defendant certifies he has discussed this motion with the attorney for the government, John Cannizzaro, who does not oppose it.

IV. Conclusion

This motion is not made for purposes of delay but in the interests of justice. Defendant moves the Court to continue: the plea deadline to November 24 and the trial to December 22.

Respectfully Submitted,

MAUREEN SCOTT FRANCO
Federal Public Defender

/S/
SHANE O'NEAL
Assistant Federal Public Defender
Western District of Texas
108 N. 10th Street
Alpine, Texas 79830
(432) 837-5598
Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of October, 2020, I electronically filed the foregoing with the Clerk of Courts using the CM/ECF system which will send notification of such filing to the following:

AUSA John Cannizzaro, Office of the U.S. Attorney, 2500 N. Hwy 118, Suite A200, Alpine, TX 79830.

/S/
SHANE O'NEAL
Attorney for Defendant

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Order to Continue

These deadlines in Thomas Perkins's case are continued:

The plea deadline is November 24, 2020.

The jury selection and trial are continued to December 22, 2020.

Signed on the _____ day of October 2020.

David Counts
United States District Judge